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The Honorable Timothy A. Bradshaw
KING COUNTY
Note for Hearing: November 16, 2018
SUPERIOR COURT CLERK
Oral Argument Scheduled
FILED

CASE NUMBER: 18-2-14942-8 SEA

SUPERIOR COURT FOR THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF KING

JAMES EGAN, individually,

Plaintiff,

v.

CITY OF SEATTLE, a Washington municipal
corporation,

Defendant.

NO. 18-2-14942-8 SEA
(Consolidated)

**DECLARATION OF BRUCE
HARRELL IN SUPPORT OF
DEFENDANT CITY OF SEATTLE'S
OPPOSITION TO PLAINTIFF
JAMES EGAN'S MOTION FOR
PARTIAL SUMMARY JUDGMENT**

ARTHUR WEST,

Plaintiff,

v.

SEATTLE CITY COUNCIL, CITY OF
SEATTLE, LISA HERBOLD, BRUCE
HARRELL, KSHAMA SAWANT, ROB
JOHNSON, DEBORA JUAREZ, MIKE
O'BRIEN, SALLY BAGSHAW, TERESA
MOSQUEDA, LORENA GONZALEZ,

Defendants.

1 I, BRUCE HARRELL, hereby state and declare as follows:

2 1. I am a member of the Seattle City Council and have been since 2008. I am
3 presently Council President. I am over the age of eighteen, am competent to testify, and make
4 this declaration based on personal knowledge.

5 2. In early April 2017, Lincoln Beauregard, counsel to Plaintiff Egan in this matter,
6 filed a lawsuit against Ed Murray, who was then the Mayor of Seattle. This lawsuit—on behalf
7 of a plaintiff initially identified only as “D.H.”—included disturbing allegations of sexual
8 abuse. Unsurprisingly, the lawsuit was a significant topic in the news.

9 3. Given the controversy generated by the lawsuit, I thought it important to
10 communicate publicly that the City Council would stay focused on its mission and core
11 responsibilities, would defer to the pending judicial process, and would not become distracted
12 by or embroiled in the lawsuit. As Council President and department head, I believed it
13 appropriate to articulate to the public my opinion on the general direction of the Legislative
14 Department.

15 4. I worked on an initial draft with Ms. Dana Robinson Slote, Director of
16 Communications for the Legislative Department and one of my direct reports. Ms. Slote
17 continued to edit the statement and she also received input from my Legislative Assistant Vinh
18 Tang.

19 5. Attached hereto as **Exhibit A** is a true and correct copy of the press release /
20 public statement that I authorized to be released on Monday April 10, 2017. This press release
21 is posted on the City Council’s website at the following URL:
22 <http://council.seattle.gov/2017/04/10/council-president-bruce-harrells-statement/>.

23 6. Prior to issuing my April 10, 2017 statement, I did not seek input from any other
24 Councilmember or staff regarding the statement and no other Councilmember or staff drafted,
25 edited, reviewed or approved the statement.¹ The statement was released in my name only.

26
27 ¹ The other members of the Seattle City Council in April 2017 were Sally Bagshaw, Tim Burgess, Lorena
González, Lisa Herbold, Rob Johnson, Deborah Juarez, Mike O’Brien and Kshama Sawant.

**I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE
STATE OF WASHINGTON THAT THE FOREGOING IS TRUE AND
CORRECT.**

 Bruce Hamell

Bruce Harrell

EXHIBIT A

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Council President Bruce Harrell's Statement

Council President Bruce Harrell issued the following statement:

"My Council colleagues and I have no intention of commenting on matters of pending or potential litigation. We believe that it is critically important that, together, we remain committed to the business of governing.

"All City employees and City departments are focused on our core responsibilities of customer service, affordable housing, homelessness, public safety, transportation, education, and ensuring equality for all in a great, but rapidly growing city. The work before us is too critical for the future of Seattle and its residents. We intend to continue working with unwavering dedication to serving the people who put their faith in us.

"Our city cannot afford to be distracted. There is a judicial process that will address the serious allegations that this situation has presented, and we will respect that process and the rights of all parties involved. All accusations of abuse require a thorough investigation. It is in our human nature to immediately want answers, but I ask we not cast aspersions to the parties involved before we have all the facts through the legal process. I am confident that through this process, truth and justice will prevail.

"It is worth repeating we are steadfast and focused on serving the people of Seattle. Council has a strong committee structure that works with the city's 40 departments in upholding our City Charter *'of protecting and enhancing the health, safety, environment, and general welfare of the people; to enable municipal government to provide services and meet the needs of the people efficiently; to allow fair and equitable participation of all persons in the affairs of the City; to provide for transparency, accountability, and ethics in governance and civil service; to foster fiscal responsibility; to promote prosperity and to meet the broad needs for a healthy, growing City.'*"

Posted: April 10th, 2017 under [Harrell](#), [News Releases](#).

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CERTIFICATE OF SERVICE

I hereby declare under penalty of perjury under the laws of the State of Washington that on this date, I caused a true and correct copy of the foregoing document to be served on the following in the manner(s) indicated:

Lincoln Beauregard
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- ☒ Via E-Filing
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- ☐ Via E-Filing
☐ Via Legal Messenger
☒ Via Email
☐ Via U.S. Mail
☐ Via Fax

Pro Se Plaintiff

DATED this 5th day of November, 2018 at Seattle, Washington.


Gabriella Sanders